

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
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Modernizing the E-rate Program for)	
Schools and Libraries)	WC Docket No. 13-184
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**Comments of
the Northwest Council for Computer Education**

I. Introduction

The Northwest Council for Computer Education provides E-Rate consulting services to schools and libraries in Idaho, Montana, Washington, Oregon, and Hawaii. We have been providing services for four years, although our department director, Eric Chambers, has been providing E-Rate services for 15 years. We respectfully submit these comments on behalf of our agency and the districts and libraries we serve.

We support the Commission's intent in this Notice of Proposed Rulemaking with a few exceptions outlined below, a request for clarification on some items, and requests for reconsideration of ineligible services.

II. Category 2 Budgets

As outlined in Section 14 and elsewhere, we support permanently extending the category two budget approach and avoid reverting back to the two-in-five rule. The two-in-five rule was unnecessarily complicated and had significant impacts on the District's budget process, especially in relationship to their share. The current approach allows Districts to budget for the undiscounted portion over five years rather than two.

As outlined in Section 20, 21 and elsewhere, we support an increase in the budget floor to \$25,000 and modifying the budget multiplier based on geographical location. The current floor is insufficient for many small districts as the budget's assumptions are based on student FTE rather than school size and student density. Providing wireless infrastructure, for example, to a school with 5 classrooms is essentially the same whether that school has 30 students per class or 5 students per class, yet the budgets will be vastly different. In addition, many smaller schools are in rural communities with fewer eligible service providers (limiting competition), and the limited purchasing power of smaller school rarely qualifies for bulk purchasing discounts. Finally, even when there are multiple service providers serving a particular geographical area, smaller districts tend to get fewer bids as providers generally prioritize larger projects when allocating bid resources. This effectively reduced competition and drives up prices.

As outlined in Section 28 and elsewhere, we believe budgets should reflect actual student population each year. Some districts experience significant growth over a five year period. In some cases, this growth results in inadequate infrastructure. This is especially true when growth demands require building additional instructional facilities or remodeling existing facilities. By adjusting budgets annually, districts will more easily be able to afford infrastructure upgrades to keep up with growing demands.

As outlined in Sections 31-35 and elsewhere, we strongly support the notion of a fixed budget cycle. A fixed budget cycle provides districts with the clearest path to planning technology infrastructure improvements over a five year period and allows them to implement improvements when it makes the most sense for them rather than rushing to get an application out just to start the five year cycle. Two primary considerations generally influence a district's decision to apply for E-Rate funds. Foremost, is the actual need for technology infrastructure upgrades or improvements. The second is the district's ability to pay their share. This is most important for medium sized districts with multiple small schools. For example, a district may know that in the next five to 7 years they need to replace all

layer 3 switching and all their wireless infrastructure. Assuming both projects would individually deplete their five year budget, a district that was not able to implement the first of the two projects for three years would have to wait an additional five years to complete the second project. With a fixed budget cycle, the district could complete both projects in six years. We recommend an approach that will start a fixed year cycle that will begin in 2020, and each district and library will have a renewed budget.

III. Eligible Services

While we understand the eligible services list will be published in draft form shortly, we have two comments related to this list. First, we seek clarification on MIBS and BMIC and would like to see clearer definitions of each as well as examples. In our experience there is a significant variation among services providers in each of these categories making it very difficult to evaluate competing proposals. Are there minimum or maximum standards for either of these categories? We often hear, informally, that E-Rate won't pay for a "Cadillac" plan, but we've never received any clarity on what that means in a practical sense.

We strongly encourage the FCC to reverse two previous portions related to eligibility services: filtering/filtering services and WiFi on buses. Filtering is required to maintain CIPA compliance. Filtering is often bundled with a firewall appliance or services and while it is a relatively easy matter to cost-allocate out the cost of the filtering services it unnecessarily complicates some district's procurement processes. Because the FCC treats firewall and filtering as separate components, some districts have to bid these individually which often increases their overall costs and frequently requires supporting two separate appliances or services.

We strongly encourage the FCC to reverse their previous position regarding wireless infrastructure on buses. In addition to transporting students to and from home, buses are used to transport students to out of school learning opportunities. Having access to wireless internet connectivity while on buses

effectively extends the learning time for students and makes more efficient use of other technology infrastructure. Buses are extensions of the campus environment and should be recognized as such by the FCC.

IV. Conclusion

The Second Modernization Order fixed many of the flaws in the E-Rate program. The Commission's data, as well as evaluations from third party organizations, have demonstrated the program is working better. We believe with a few minor fixes and clarifications this program will continue to improve in its ability to supports schools and libraries across the county.

Respectfully submitted,

/s/ Eric Karl Chambers

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